UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,)
Plaintiff,)
v.) C.A. No. 04-10353-PBS
VOICE SIGNAL TECHNOLOGIES, INC., LAURENCE S. GILLICK, ROBERT S. ROTH, JONATHAN P. YAMRON, and MANFRED G. GRABHERR,))))
Defendants.)))

DEFENDANT'S ASSENTED-TO MOTION FOR IMPOUNDMENT

Defendant Manfred Grabherr moves pursuant to Local Rule 7.2 and section 14 of the parties' agreed-to Protective Order for an order impounding an unredacted version of its Reply in Support of his Motion for Summary Judgment and Exhibits A – D to the Declaration of Wendy S. Plotkin. A partially redacted copy of the Reply is being filed concurrently electronically; an unredacted copy of the Reply is being filed concurrently by hand.

As grounds for this motion, Grabherr states that several pages from his Memorandum quotes from deposition testimony that has been designed "highly confidential" and from e-mails produced by ScanSoft in this litigation which ScanSoft has designated as highly confidential pursuant to the parties' Protective Order. Pursuant to section 14 of the parties' Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose highly confidential information, as defined by the Protective Order, must be filed under seal.

WHEREFORE, Grabherr requests that the Court enter an order impounding the unredacted version of his Reply and Exhibits A through D of the Declaration of Wendy S. Plotkin. Grabherr further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file his unredacted Reply and Exhibits A - D under seal concurrently with this motion for impoundment.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

Robert S. Frank, Jr. (BBO No. 177240)
Sarah Chapin Columbia (BBO No. 550155)
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Dated: July 6, 2005

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on July 6, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

<u>/s/</u>	Wendy S.	. Plotkin

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